

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION
CASE NUMBER: 3:23-cv-05393-MGL**

Dominique B. Lovejoy,

Plaintiff,

v.

Jason L. Richardson, Rocket Expediting, LLC,
Super Ego Holdings, LLC, Super Ego
Logistics, LLC, Stefan Perovic, and Sendmee
Trucking, LLC,

Defendants.

**DEFENDANTS ROCKET EXPEDITING
LLC, SUPER EGO HOLDINGS, LLC,
SUPER EGO LOGISTICS, LLC, STEFAN
PEROVIC, JASON LEE RICHARDSON,
AND SENDMEE TRUCKING, LLC'S
REPLY TO STANDING ORDER
REGARDING ALL REMOVED CASES**

TO: THE UNITED STATES DISTRICT COURT:

In response to the Court's Standing Order Regarding All Removed Cases Assigned to
Judge Mary Geiger Lewis, the Defendants respond as follows:

1. The date(s) Defendant(s) or their representative(s) first received a copy of the
summons and complaint in the state court action;

RESPONSE: October 6, 2023.

2. The date(s) each Defendant was served with a copy of the summons and
complaint, if any of those dates differ from the date(s) set forth in item number 1;

RESPONSE: October 6, 2023.

3. In actions predicated on diversity jurisdiction, an explanation of whether any
Defendants who have been served are citizens of South Carolina;

Note: for purposes of diversity jurisdiction, a corporation is a citizen of "any State by
which it has been incorporated and of the State where it has its principal place of business." 28
U.S.C. § 1332(c)(1); *Hertz Corp. v. Friend*, 559 U.S. 77, 77 (2010). In a suit against an

unincorporated entity, however, diversity jurisdiction depends on the citizenship of all the entity's members. *Carden v. Arkoma Assocs.*, 494 U.S. 185, 195 (1990).

RESPONSE: None of the Defendants are residents of South Carolina.

Defendant Richardson is a citizen and resident of the State of Alabama.

Defendant Sendmee Trucking, LLC is a Limited Liability Company organized under the laws of the State of Alabama with its principal place of business in Alabama. Additionally, all members of the LLC are residents of the state of Alabama.

Defendant Rocket Expediting, LLC is a Limited Liability Company organized under the laws of the State of Ohio with its principal place of business in Ohio. Additionally, all members of the LLC are residents of the state of Ohio.

Defendant Super Ego Holdings, LLC is a Limited Liability Company organized under the laws of the State of Illinois with its principal place of business in Illinois. Additionally, all members of the LLC are residents of the state of Illinois.

Defendant Super Ego Logistics, LLC is a Limited Liability Company organized under the laws of the State of Illinois with its principal place of business in Illinois. Additionally, all members of the LLC are residents of the state of Illinois.

Defendant Stefan Perovic is a citizen and resident of the State of Illinois.

4. In actions predicated on diversity jurisdiction, the basis for believing that the amount in controversy exceeds \$75,000.00;

RESPONSE: Though Plaintiff's Complaint does not state a specific amount of damages, Plaintiff has claimed substantial and serious physical injuries and emotional harm, lost wages, loss of earning capacity, and punitive damages. (Complaint, ¶ 15, 16, 20, 25, and Prayer).

5. If removal takes place more than thirty days after any Defendant first received a copy of the summons and complaint, the reasons why removal has taken place at this time and the date on which Defendant(s) first received a paper identifying the basis for such removal;

RESPONSE: N/A

6. In actions removed on the basis of this Court's diversity jurisdiction in which the action in state court was commenced more than one year before the date of removal, the reasons why this action should not summarily be remanded to state court; and

RESPONSE: N/A

7. The identity of any Defendant who Plaintiff(s) served prior to the time of removal who did not formally join in notice of removal and the reasons therefore.

RESPONSE: N/A

MURPHY & GRANTLAND, P.A.

s/Crawford A. Krebs

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Columbia, South Carolina
November 3, 2023